

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

Petition for Declaratory Ruling of)
Continental Airlines, Inc.)

ET Docket No. 05-247

MOTION FOR EXTENSION OF FILING DEADLINES

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August 16, 2005

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In a Public Notice, DA 05-2213 (July 29, 2005), the Commission recently established deadlines for the filing for comments and reply comments regarding a Petition for Declaratory Ruling (the “Petition”) filed by Continental Airlines, Inc. (“Continental”), in connection with a dispute between Continental and the Massachusetts Port Authority (“Massport”). The Airports Council International – North America (“ACI-NA”) hereby respectfully requests that the Commission extend by at least thirty days the deadlines for filing comments and reply comments in this proceeding.¹ The deadlines set in the Public Notice are August 29, 2005, and September 13, 2005, respectively.

ACI-NA represents the local, regional, and state governing bodies that own and operate the principal airports served by scheduled air carriers in the United States. The U.S. airport

members of ACI-NA enplane more than 95 percent of the total domestic, and virtually all international, scheduled airline passenger and cargo traffic in the United States. ACI-NA intends to file comments in this proceeding, and wishes to present the Commission with as complete a record as possible regarding the views of its members. Individual airports may also wish to file comments informing the Commission of their policies, concerns, and experience regarding the deployment of WiFi facilities on their premises. ACI-NA believes that developing a complete record is essential, because any decision by the Commission in this matter could have national effects, beyond the scope of the dispute between the parties. The delivery of WiFi services on airport premises is of great importance to ACI-NA's members and to the millions of passengers who pass through individual airports every year. Consequently, a fair resolution of the issues presented by the Petition is essential not only to ACI-NA and its members, but to the public in general.

ACI-NA requires more time to develop its comments in this matter because extensive discussion and coordination will be required between ACI-NA and its members, in order to present the Commission with a fair statement of the views and concerns of airports. This consultation process is time-consuming and would be very difficult to accomplish by the current August 29 comment deadline, even under the best of circumstances. Consultation will be made even more difficult because we are now at the peak of the summer vacation season. Key decision-makers are now or soon will be unavailable, just at the time fundamental decisions about the contents of ACI-NA's comments will need to be made. A thirty-day extension to

¹ As discussed below, the specific dates proposed by ACI-NA are Friday, September 30, 2005, and Friday, October 14, 2005.

September 28 for the comments and October 13 for the reply comments would greatly alleviate this problem. For the sake of convenience, a slightly longer extension to September 30 and October 14 for the comments and reply comments, respectively, would place both the new dates on a Friday.

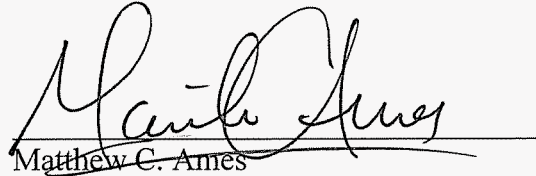
Finally, we believe that an extension will not cause any hardship to either of the parties to the Petition. It is our understanding that the parties are engaged in discussions to resolve their differences. Accordingly, we believe that Continental would not be harmed by an extension. We have also been informed by counsel for Massport that Massport has no objection to an extension, and is seeking an extension independently.

ACI-NA has not contacted Continental to seek Continental's consent to this motion. We are informed by counsel for Massport, however, that counsel for Continental has informed counsel for Massport that Continental is not certain of its position regarding any extension request. Based on our knowledge of the facts, however, the substantive matters at issue do not demand urgent resolution.

For the reasons set forth above, the grant of an extension would be in the public interest. Accordingly, we respectfully urge the Commission to extend the date for comments to at least September 28, 2005, and the date for reply comments to at least October 14, 2005.

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matthew C. Ames", is written over a horizontal line.

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August 16, 2005

Certificate of Service

I hereby certify that I have caused to be mailed this 16th day of August, 2005, copies of the foregoing Motion for Extension of Filing Deadlines of the Airports Council International – North America, by first-class mail, postage prepaid, to the following persons:

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***Service by ECFS**


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